

## REMARKS/ARGUMENTS

Claims 1, 3-8 and 11-20 remain in this application. Claims 2 and 9-10 have been cancelled. Claims 4-7, 14-17, and 19-20 have been amended to overcome the rejection under 35 U.S.C. 112. Claim 1 has been amended to include the substance of claim 2, while claim 8 has been amended to include the substance of claim 9.

Applicants have considered the cited references, including Kahveci (U.S. Patent No. 6,973,037) and Ogasawara et al. (U.S. Patent No. 6,307,865), and believe that the present claims, as amended, are distinguishable from the cited references. In particular, the asserted combination does not disclose the features presented in independent claims 1, 8 and 18, as amended, for at least the reasons discussed below:

1. Kahveci attempts to reconfigure the physical link throughput/capacity dynamically in the ISDN network. (Kahveci, col. 2, lines 34-52.) The various embodiments of the present invention as presented in independent claims 1, 8 and 18 have nothing to do with the physical capacity/bandwidth of the network. Instead, applicants' method reconfigures the software capacity in terms of handling number of calls in the system level, which is usually the maximum number of call events/attempts that the network/equipment provider, *i.e.*, Alcatel-Lucent, agrees to provide to the service provider, *i.e.*, Verizon wireless. The lower level physical bandwidth stays the same, unchanged all the time.

2. Kahveci relates to ISDN bandwidth reconfiguration. More particularly, it relates to the number of B channels to be allocated between an ISDN device (end user device) and the service provider's equipment in the central office. (Kahveci, col. 5, lines 25-28; FIG. 3.) The present claims address the capacity reconfiguration between the service provider's network and the software/equipment provider's supported call capacity, which is usually an agreed-upon contract between them.

3. Kahveci addresses the reconfiguration of the ISDN bandwidth between the ISDN device and the service provider's central office (CO), which is usually a one-to-one relationship. (Kahveci, col. 5, lines 37-42; FIG. 3.) The present claims allow a network level capacity to be reconfigured, which controls the aggregation of call events for a group of base stations, which usually can be up to 1000 base stations in a Mobile Switching Center's network. The present claims place no

restriction on the call event capacity on an individual base station; the overall network level call event capacity is controlled instead.

4. Kahveci relates to the dynamic reconfiguration of the ISDN PRI bandwidth, which has a definite physical limit (23 B channels at the most). (Kahveci, col. 1, lines 25-43.) The present claims allow dynamic reconfiguration of the number of call events, which is a software limit and can be improved over time by the software/equipment provider via fast processors, better algorithms, and more efficient call handling, etc.

5. The present claims also provide the capability of linking the newly reconfigured call event capacity back to the software/equipment provider's system, which enables the billing/charging for that service provider to be automatically readjusted too. This feature is not disclosed in Kahveci.

6. Ogasawara et al. (US Patent No. 6,307,865) is cited for its alleged disclosure of various features of claims 1, 8 and 18 other than the aforementioned features. Applicants respectfully submit that Ogasawara does not add anything to the disclosure of Kahveci that would remedy the above-mentioned deficiencies.

### **CONCLUSION**

For at least the reasons detailed above, it is respectfully submitted all claims remaining in the application (Claims 1, 3-8 and 11-20) are now in condition for allowance. The foregoing comments do not require unnecessary additional search or examination.

In the event the Examiner considers personal contact advantageous to the disposition of this case, he/she is hereby authorized to telephone John S. Zanghi, at (216) 861-5582.

Respectfully submitted,

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Date

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